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Office of the United States Attorney
District of Nevada
501 Las Vegas Boulevard, Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336

FILED	RECEIVED
ENTERED	SERVED ON
COUNSEL/PARTIES OF RECORD	
SEP 19 2018	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY _____	DEPUTY

DAYLE ELIESON
United States Attorney
District of Nevada
LINDA MOTT
Assistant United States Attorney
501 Las Vegas Boulevard South
Suite 1100
Las Vegas, Nevada 89101
702-388-6059

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

-oOo-

UNITED STATES OF AMERICA,

Plaintiff,

vs.

**NAM VIET NGUYEN, and
JOSELYNN VIRAY GAN,**

Defendants.

**SEALED
CRIMINAL INDICTMENT**

Case No.: 2:18-cr- 291

VIOLATIONS:

21 U.S.C. §§ 846, 841(a)(1),
841(b)(1)(A)(viii), and 841(b)(1)(C) –
Conspiracy to Distribute a Controlled
Substance (Methamphetamine and
Heroin)

21 U.S.C. §§ 841(a)(1) and
841(b)(1)(A)(viii) – Distribution of a
Controlled Substance
(Methamphetamine)

21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C) –
Distribution of a Controlled Substance
(Heroin)

18 U.S.C. § 2 – Aiding and Abetting.

THE GRAND JURY CHARGES THAT:

COUNT ONE

(Conspiracy to Distribute Methamphetamine and Heroin)

1 Beginning from a time unknown, and continuing up to and including July 6,
2 2018, in the State and Federal District of Nevada,

3 **NAM VIET NGUYEN, aka "Chino," and**
4 **JOSELYNN VIRAY GAN,**

5 defendants herein, and others known and unknown to the grand jury, did
6 knowingly and intentionally combine, conspire, confederate and agree with
7 individuals known and unknown to distribute 50 grams or more of actual
8 methamphetamine, a Schedule II controlled substance, in violation of Title 21,
9 United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A)(viii); and to distribute
10 a mixture and substance containing a detectable amount of heroin, a Schedule I
11 controlled substance, in violation of Title 21, United States Code, Sections 846,
12 841(a)(1), and 841(b)(1)(C).

13 **COUNT TWO**

(Distribution of a Controlled Substance)

14 On or about February 16, 2017, in the State and Federal District of Nevada,

15 **NAM VIET NGUYEN, aka "Chino,"**

16 defendant herein, knowingly and intentionally distributed 50 grams or more of
17 actual methamphetamine, a Schedule II controlled substance, in violation of Title
18 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii).

19 **COUNT THREE**

(Distribution of a Controlled Substance)

20 On or about March 1, 2017, in the State and Federal District of Nevada,

21 **NAM VIET NGUYEN, aka "Chino," and**
22 **JOSELYNN VIRAY GAN,**

1 defendants herein, aiding and abetting one another, knowingly and intentionally
2 distributed a mixture and substance containing a detectable amount of heroin, a
3 Schedule I controlled substance, in violation of Title 21, United States Code,
4 Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

5 **COUNT FOUR**

(Distribution of a Controlled Substance)

6 On or about March 16, 2017, in the State and Federal District of Nevada,

7 **NAM VIET NGUYEN, aka "Chino," and**
8 **JOSELYNN VIRAY GAN,**

9 defendants herein, aiding and abetting one another, knowingly and intentionally
10 distributed a mixture and substance containing a detectable amount of heroin, a
11 Schedule I controlled substance, in violation of Title 21, United States Code,
12 Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

13 **COUNT FIVE**

(Distribution of a Controlled Substance)

14 On or about March 22, 2017, in the State and Federal District of Nevada,

15 **NAM VIET NGUYEN, aka "Chino,"**

16 defendant herein, knowingly and intentionally distributed 50 grams or more of
17 actual methamphetamine, a Schedule II controlled substance, in violation of Title
18 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii).

COUNT SIX

(Distribution of a Controlled Substance)

On or about May 5, 2017, in the State and Federal District of Nevada,

NAM VIET NGUYEN, aka "Chino,"

defendant herein, knowingly and intentionally distributed 50 grams or more of actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii).

COUNT SEVEN

(Distribution of a Controlled Substance)

On or about April 23, 2018, in the State and Federal District of Nevada,

**NAM VIET NGUYEN, aka "Chino," and
JOSELYNN VIRAY GAN,**

defendants herein, aiding and abetting one another, knowingly and intentionally distributed 50 grams or more of actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii), and Title 18, United States Code, Section 2.

COUNT EIGHT

(Distribution of a Controlled Substance)

On or about July 6, 2018, in the State and Federal District of Nevada,

JOSELYNN VIRAY GAN,

defendant herein, knowingly and intentionally distributed 50 grams or more of

1 actual methamphetamine, a Schedule II controlled substance, in violation of Title
2 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii).

3 **DATED:** this 19th day of September 2018.

4 **A TRUE BILL:**

5
6 /S/
7 FOREPERSON OF THE GRAND JURY

8 DAYLE ELIESON
9 United States Attorney

10 
11 LINDA MOTT
12 Assistant United States Attorney